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Before the
FEDERAL COMMUNICATIONS COMMISSION
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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of

Co-Channel Protection
Criteria for Part 90,
Subpart S Stations
Operating Above 800 MHz

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PR Docket No. 93-60
RM-8028

To: The Commission

JOINT REPLY COMMENTS

The National Association of Business and Educational Radio, Inc. ("NABER"), the American Mobile Telecommunications Association ("AMTA"), the Industrial Telecommunications Association, Inc. ("ITA") and Motorola, Inc. ("Motorola") ("the Joint Commentors") hereby jointly submit, pursuant to Section 1.415 of the Commission's Rules, 47 C.F.R. §1.415, the following Reply Comments in above-captioned proceeding:

I. BACKGROUND

In their Comments, the Joint Commentors suggested that a constant correction factor be applied to the F(50,50) curve for determining the interference contour distance, and that the use of the F(50,10) curve be abandoned.¹ The Comments described an

¹The Joint Comments recommended a 12 dB constant correction factor when using the F(50,50) curves for determining the distance to the interference contour. The 12 dB figure is an approximation of the differences between the F(50,50) and the F(50,10) curves at distances relevant to land mobile operations as indicated by R-6602 Report Figure 26 (attached to the Joint Comments). The proposal to use the F(50,50) curves for calculating interference contours has apparently led to some confusion in the terminology used to describe the proposed interference protection criteria. In essence, however, a protection criterion described as "40/10 dBμ" protection where both contours are calculated using the

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alternate method to derive a minimum co-channel spacing table for use in the 800 MHz band. The table takes into account the DHAAT (directional height above average terrain) and ERP (effective radiated power) of both the proposed and existing stations. The F(50,50) curves were used for both the desired and undesired signals, with a minimum separation of 50 miles.

In order to eliminate the potential for interference to and from high elevation systems, the Joint Commentors proposed additional protection beyond that delineated in the short space table, for stations with high height above average terrain (HAAT) values. The Joint Commentors also proposed that the Commission alter its Rules such that operations on offset channels are afforded interference protection from their adjacent, primary channels.

In situations where the Short-Spacing Table created in this proceeding may be inefficient or inappropriate, the Joint Commentors recommended that an applicant should have the option of an "alternative showing", which requests authority for operation which would not normally be permitted under the Short-Spacing Table.

Finally, the Joint Commentors expressed their concern that the advent of digital equipment may necessitate a review by the Commission as to whether the separation standards adopted in this

F(50,50) curves is intended to provide the same level of theoretical protection as a criterion described as "40/22 dBμ" where the interference contours is calculated using the F(50,10)

proceeding are sufficient and specifically requested that the Commission adopt new rules as soon as possible in this proceeding, and revisit the separation standards shortly after digital equipment has become widely available.

II. REPLY COMMENTS

It was generally recognized that the Commission's existing co-channel criteria for non-SMR Pool systems is inadequate,² and agreed that the same criteria should be used for all pools.³ However, while several parties advocated the adoption of a different criteria, such parties either did not specify the criteria to be used⁴ or failed to address the significant problems with adoption of their proposed methodology which have been previously discussed in this proceeding.⁵

Although it is agreed throughout the industry that R-6602 curves present only a generalized view of predicted terrain, the fact remains that use of the curves is currently the most appropriate criteria that satisfies the needs of the land mobile community in the 800\900 MHz band at this time. Specifically, as discussed by NABER in its Reply Comments in this proceeding filed on August 27, 1992, the R-6602 methodology: (1) permits short-

²See e.g., Comments of Utilities Telecommunications Council ("UTC"), Federal Express Corporation ("Federal Express").

³Comments of Fleet Call, Inc. ("Fleet Call") at 4; Utilities Telecommunications Council ("UTC") at 3.

⁴Comments of UTC at 1.

⁵Comments of Southern California Edison Company ("SCE") at 5; Texas Utility Electric Company at 6.

spacing where appropriate; (2) provides applicants and licensees with a reasonable idea as to the areas where existing systems should be protected; (3) can be easily verified by the Commission; and (4) does not result in a "battle of the engineers" resulting from the differences in assumptions that can be utilized for many engineering programs. On page 2, its Comments Federal Energy

Fleet Call suggests that the Commission retain its existing short-spacing "chart", which protects existing stations at 1000 feet HAAT/1000 watts ERP.⁷ Fleet Call's concern is based upon the fact that "... there is virtually no empirical data demonstrating the real world desirability of more intensive short-spacing of lower-power stations."⁸

It is the position of the Joint Commentors that the protection of existing stations at 1000 watts ERP and 1000 feet HAAT would be spectrally inefficient and disrupt the "level playing field" which the Commission has sought to achieve. All parties agree that existing stations granted under the "old" 40/30 dB μ standard should be "grandfathered". However, it does not seem necessary to protect a station at the 1000/1000 level which has a directional HAAT of 100 feet, which operates with 50 watts ERP. Further, the legitimate concern of Fleet Call with "greenmail" applications could actually be more prolific under Fleet Call's proposals. Specifically, a "greenmail" applicant could place a low power, low HAAT system 50 miles away from a legitimate operator, the "greenmail" applicant could then receive protection for operational parameters which could never be achieved. This could limit the legitimate licensee's ability to relocate when necessary to convert to multiple site operation.

The Joint Commentors believe that the proposed Table and protection criteria in the Joint Commentors filing adequately

⁷Comments of Fleet Call at 7.

⁸Fleet Call Comments at 5 (footnote omitted).

addresses Fleet Call's concerns. By providing only three levels of protection for existing systems, the proposed table provides adequate protection to existing facilities while reserving some degree of flexibility for existing stations to perform future modifications. This also helps address some of the "digital unknowns" for the short term and significantly reduces greenmail opportunities. In addition, the chart considers the potential interference received by both the existing facility as well as the applied for station and would not permit new assignments at

is inappropriate to directly relate it to the 40/22 dBu protection

III. CONCLUSION

WHEREFORE, the National Association of Business and
Educational Radio, Inc., the American Mobile Telecommunications